



UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

[1] CHESTER GALLAGHER
[2] HEATHER IDONI
[3] CALVIN ZASTROW
[4] COLEMAN BOYD
[6] PAUL VAUGHN
[7] DENNIS GREEN

No. 3:22-CR-00327
JUDGE TRAUGER

UNOPPOSED MOTION REQUESTING PERMISSION TO FILE ADDITIONAL *IN LIMINE* MOTIONS WARRANTED BY ADDITIONAL GOVERNMENT DISCLOSURES IF NECESSARY

Comes now the Defendants, Chester Gallagher, Heather Idoni, Calvin Zastrow, COLEMAN BOYD, PAUL VAUGHN and DENNIS GREEN, by and through undersigned counsel, and hereby requests permission to file additional *in limine* motions should additional unanticipated issues arise following the Government's further disclosures of discovery and Jencks materials which defense counsel anticipate prior to trial.

In support of this motion, the Defendants submit as follows:

Pursuant to this Court's scheduling order, the Defendants' *in limine* motions are due December 4, 2023 (DE 298). In anticipation of the *in limine* deadline, defense counsel and the Government have conferred about various issues. The parties have reached agreement on some issues and will file *in limine* motions addressing issues that remain in dispute by the December 4th, 2023, deadline. While discussing these issues, the Government indicated that it intends to